

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA

MONICA PERRYMAN,	)	
	)	
Plaintiff,	)	
	)	2:06-cv-216-mef
V.	)	
	)	
FIRST UNITED METHODIST	)	
CHURCH and DARLENE MAYE,	)	
	)	
Defendants.	)	
	)	

**DEFENDANTS' EXHIBIT LIST**

COME NOW the Defendants, First United Methodist Church and Darlene Maye and reserve the right to offer (or to object to) any of the following exhibits (or excerpts or portions of said exhibits) at the trial in this matter:

1. Medical records of William Graves, M.D., relating to Monica Perryman;
2. Documents and information contained within Monica Perryman's personnel file as maintained by First United Methodist Church's ECDC program;
3. Copies of any and all ECDC correspondence regarding Monica Perryman;
4. Photographs of Monica Perryman taken in furtherance of her employment with the ECDC;
5. Any and all documentation establishing ECDC's purpose;
6. Photographs illustrating the ECDC facility including, but not limited to, its classrooms;
7. Literature and materials utilized by the ECDC program for teaching purposes;
8. All documents which were (a) requested to be produced at, (b) produced at, (c) mentioned in, or (d) made exhibits to Plaintiff's deposition;
9. All admissible documents attached to Plaintiff's belated Response to

Defendants' Motion for Summary Judgment;

10. All evidentiary submissions filed in support of Defendants' Motion for Summary Judgment;
11. All documents which were requested in Defendants' Requests for Production of Documents;
12. All documents, including interrogatory and request for production responses, produced by any party in response to discovery requests in this matter;
13. All documents which were referred to in depositions, produced at depositions, and/or attached as exhibits to any depositions in this matter;
14. All deposition testimony as may be necessary for impeachment or rebuttal purposes;
15. Charts, graphs, summaries, or other demonstrative aids depicting or summarizing the information contained in other exhibits and/or testimony;
16. Blow-ups, enlargements, or any computerized images of any of the above for demonstrative purposes;
17. Any exhibit listed by Plaintiff;
18. Any exhibits which is obtained, discovered, or received between now and the time of the trial; and
19. Any rebuttal or impeachment exhibit, document, item or thing.

The Defendants reserve the right to amend this list prior to trial of this matter with reasonable notice to Plaintiff.

Respectfully submitted this the 16<sup>th</sup> day of January, 2007.

*s/ R. Brett Garrett*

Robert A. Huffaker (HUF003)

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R. Brett Garrett (GAR085)

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Methodist Church and Darlene Maye

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**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing upon:

Norman Hurst, Jr., Esq.  
462-A Sayre Street  
Montgomery, Alabama 36104

by placing same in the United States Mail, postage prepaid and properly addressed on this the 16<sup>th</sup> day of January, 2007.

/s/ R. Brett Garrett  
Of Counsel